

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-1: Please identify the version of the NRCM used to produce the cost estimates set forth in Exhibit RJW-3.

Respondent: R. Walsh

RESPONSE: Version 2.2 of the NRCM was used to produce the cost estimates set forth in Exhibit RJW-3. The input values were also modified to reflect state-specific labor rates for Verizon-Massachusetts, as well as a Massachusetts-specific variable overhead and copper loop percentage.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-2: Please provide all input values to the NRCM used by Mr. Walsh to produce the costs listed in Exhibit RJW-3. Provide all documents, studies, source material etc. that support the use of these inputs.

Respondent: R. Walsh

RESPONSE: The input values used to produce the costs listed in Exhibit RJW-3 are listed in Exhibit 3 in the worksheet entitled "INPUTS".

The default input values used were developed by a variety of subject matter experts who reached consensus through participating in roundtable discussions. The documentation and justification for the use of these values is fully explained in the NTAB, attached as Exhibit 2 to the Direct Testimony of Richard Walsh and the NRCM Version 2.2 Model Description, attached as Exhibit 1 to the Direct Testimony of Richard Walsh.

The Massachusetts-specific inputs used in the NRCM derived from the Hatfield model and Verizon labor contracts. The source of the labor rates was the General Contract Agreements between the Communications Workers of America, AFL-CIO and the International Brotherhood of Electrical Workers, AFL-CIO and Verizon of New England, both effective August 6, 2000. The variable overhead and the copper loop percentage used in Massachusetts are the same as those used in the Hatfield model and are described more fully in the Direct Testimony of Robert A. Mercer and the documentation accompanying the recurring cost testimony.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-3: Please provide all documents, time and motion studies, and source material concerning, referring, or relating to the development of the NRCM.

Respondent: R. Walsh

RESPONSE: AT&T objects to this request on the grounds that it is overbroad and burdensome in seeking all documents relating to the development of the model. Without waiving this objection, AT&T states that the NRCM has been developed by a panel of subject matter experts who reached consensus through participating in roundtable discussions. The reasoning of the participating experts and other documentation and justification for the NRCM is presented and fully explained in the NTAB, attached as Exhibit 2 to the Direct Testimony of Richard Walsh, and the NRCM Version 2.2 Model Description, attached as Exhibit 1 to the Direct Testimony of Richard Walsh.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-4: Please provide all documents, time and motion studies, and source material concerning, referring, relating to the development of the non-recurring cost estimates listed in Exhibit RJW-3, including, but not limited to, the batch output results.

Respondent: R. Walsh

RESPONSE:

AT&T objects to this request on the grounds that it is overbroad and burdensome in seeking all documents relating to the development of the cost estimates contained in RJW-3. Without waiving this objection, AT&T states that The batch output results were provided in Exhibit 3 to the Direct Testimony of Richard Walsh.

The Massachusetts-specific inputs used in the NRCM derived from the Hatfield model and Verizon labor contracts. The source of the labor rates was the General Contract Agreements between the Communications Workers of America, AFL-CIO and the International Brotherhood of Electrical Workers, AFL-CIO and Verizon of New England, both effective August 6, 2000. The variable overhead and the copper loop percentage used in Massachusetts are the same as those used in the Hatfield model and are described more fully in the Direct Testimony of Robert A. Mercer and the documentation accompanying the recurring cost testimony. See also, response to VZ-ATT 3-3.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-5: Please provide any non-recurring cost studies performed by AT&T within the last 3-5 years that include times for work activities that are similar or identical to those work activities included in the NRCM.

Respondent: R. Walsh

RESPONSE:

The work times included in the NRCM were arrived at over the last few years by a panel of subject matter experts who reached consensus through participating in numerous roundtable discussions. The reasoning of the participating experts and other documentation and justification for the work times used in the NRCM is presented and fully explained in the NTAB, attached as Exhibit 2 to the Direct Testimony of Richard Walsh, and the NRCM Version 2.2 Model Description, attached as Exhibit 1 to the Direct Testimony of Richard Walsh.

AT&T has not, during the requested time period, conducted additional non-recurring cost studies which include times for work activities similar or identical to those work activities included in the NRCM.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-6: Please provide the AT&T Task Oriented Costing (“TOC”) studies produced in the California Public Utilities Commission proceeding, (the “OANAD”) Docket Nos. R.93-04-003/I.93-04-002.

Respondent: R. Walsh

RESPONSE: AT&T objects to this request on the grounds that the requested documents consist of some 64,000 pages and include materials dating back to the 1980's. The requested documents are not source documents for AT&T's NRCM and are, therefore, not relevant to the issue of a study of forward looking costs or any other matter relevant to this docket. Further, AT&T objects to the request on the grounds that production of these materials would be unduly burdensome and would impose unnecessary expense.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-7: Provide a copy of all documents describing or in any way referring to the NRCM model's methodology, assumptions and operation, or addressing issues or problems which AT&T, its witnesses or consultants have identified with the model created for the purposes of developing or revising the model.

Respondent: R. Walsh

RESPONSE:

The NRCM has been developed over a number of years by a panel of subject matter experts who reached consensus through participating in roundtable discussions. That consensus and the methodology, assumptions, and operation of the NRCM are fully explained in the NTAB, attached as Exhibit 2 to the Direct Testimony of Richard Walsh, and the NRCM Version 2.2 Model Description, attached as Exhibit 1 to the Direct Testimony of Richard Walsh.

In the process of developing consensus, the subject matter experts were encouraged to express their opinions and rigorously examine all features of the NRCM. The beginning phases of that discussion inevitably included some differences of opinion. Attached hereto are documents reflecting informal exchanges during the process that eventually led to the consensus reflected in the NRCM. That consensus is fully expressed and explained in the exhibits to the Direct Testimony of Richard Walsh.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-8: Please identify each member of the "panel of experts" that reached a consensus on the activities, probabilities and work times included in the NRCM as referenced on pages 26 and 27 of Mr. Walsh's testimony.

Respondent:R. Walsh

RESPONSE: Please see the attached document entitled Non-Recurring Cost Model Primary Technical and Economic Team's Resumes.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-9: Please provide all documents concerning, referring, relating to or substantiating the “judgments” of and conclusions reached by the “panel of experts” regarding the activities, probabilities, and work time estimates included in the NRCM referenced on page 26-27 of Mr. Walsh's testimony.

Respondent: R. Walsh

RESPONSE:

AT&T objects to this request on the grounds that it is overbroad and burdensome in seeking all documents relating to the work activity estimates included in the model. Without waiving this objection, AT&T states that The NRCM has been developed over a number of years by a panel of subject matter experts who reached consensus through participating in roundtable discussions. That consensus and the judgments underlying the NRCM are fully explained in the NTAB, attached as Exhibit 2 to the Direct Testimony of Richard Walsh, and the NRCM Version 2.2 Model Description, attached as Exhibit 1 to the Direct Testimony of Richard Walsh.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-10: Please identify all costing principles supporting each conclusion reached by the "panel of experts" described on pages 26-27 of Mr. Walsh's testimony.

Respondent: R. Walsh

RESPONSE: The costing principles underlying the NRCM and applied by the panel of experts are set forth in Section II of the Direct Testimony of Richard Walsh. These costing principles incorporate the TELRIC costing methodology developed by the FCC.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-11: Please provide all documents showing the development and support of wage rates referred on page 26 of Mr. Walsh's testimony.

Respondent: R. Walsh

RESPONSE:

The wage rates used in the NRCM are derived from the General Contract Agreements between the Communications Workers of America, AFL-CIO and the International Brotherhood of Electrical Workers, AFL-CIO and Verizon of New England, both effective August 6, 2000.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of
New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-12: Please produce all documents detailing or describing the educational and
professional background of Mr. Walsh, including but not limited to, his
curricula vitae.

Respondent: R. Walsh

RESPONSE:

AT&T objects to this request on the grounds that it is overbroad and burdensome in seeking all documents describing or detailing the educational and professional background of Mr. Walsh. Without waiving this objection, AT&T states that Mr. Walsh's curriculum vita is as follows:

New England Telephone & NYNEX

1976-1977 Hyannis, Brookline, & Hingham, MA: Loop Assignment Offices.

Title & Responsibilities: Station Assignor, Service Order Assignments, Field Assistance (Service Order & Maintenance related).

1977-1978 Brockton, MA: Various offices involved in ESS Conversions in the Southeast & Metro(Boston) Districts. Assignment Offices included New Bedford, Brockton, Milford, Hyannis, and Boyden Square.

Title & Responsibilities: ESS/COSMOS Conversion Station Assignor, Assignments for new (ESS) Switch equipment, Posting of all Service Order activity into COSMOS & ESS Switch (Pre - cutover), Database Error Resolution (COSMOS & various ESS Switches), Switch Translations (Pre Cutover).

1979-1986 Brockton, MA: Various offices involved in ESS Conversions in the Rhode Island & Southeast Districts. Assignment Offices included Providence, RI, East Greenwich, East Providence, Brockton, New Bedford, Hyannis.

Title & Responsibilities: ESS/COSMOS Conversion Supervisor, Supervisor for all ESS/COSMOS Conversion activity, including: Posting of all Service Order activity into COSMOS & ESS Switch (Pre-cutover), Database Error Resolution (COSMOS & various ESS Switches), Switch Translations (Pre Cutover), Post Cut-over support, On Site training support. Staff Support to COSMOS Conversion activities.

1986-1989 Boston, MA

Title & Responsibilities: Staff Manager-FACS, Staff Support for all FACS / MLAC Conversion activity, including: Training Development & Delivery (Train the Trainer, FACS Estimate Assigning, FACS Engineering training, FACS Management Overview, FACS Station Assignor training, FACS Clerical Training, FACS Assignment Section training for Outside plant technicians). FACS Staff Hotline; including: RMA resolution, Database Maintenance (i.e. Cross Audits etc.), MLAC Post

Conversion Support, FACS Methods & Procedures support.

1989-1991 Pawtucket, RI

Title & Responsibilities: MLAC Manager responsible for all day to day activities involved in the Rhode Island Loop Assignment Center including: Service Order assignment, Estimate Assignment, Service Order & Estimate Order Field Assistance, FACS Data Base integrity, Pre & post wire-center FACS conversion activities, Held Order Assignment, On-the-Job RMA resolution & training.

1991-1992 Pawtucket, RI

Title & Responsibilities: Outside Plant Engineer responsible for Routine & Submission Engineering Work estimates, Held Orders, Estimate Quality Analysis (Post).

Bell Communications Research (Bellcore)

1992-1994 Piscataway, NJ

Title & Responsibilities: Member of Technical Staff—Software Assurance Group, responsible for FACS integration (end to end) testing.

1994-1996 Piscataway, NJ

Title & Responsibilities: Senior Consultant—Telecommunications Business Processes.

Richard J Walsh & Associates, Inc.

1996-Present Belle Mead, NJ

Title & Responsibilities: Principal Consultant.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-13: Please provide the specific rules Mr. Walsh applies to an Incumbent Local Exchange Carrier's engineering guidelines to determine if they are appropriate for use in a forward looking cost study.

Respondent: R. Walsh

RESPONSE:

AT&T objects to this request on the grounds that it is vague and ambiguous in its failure to clearly indicate what is meant by the phrase “specific rules.” Without waving this objection, AT&T states that an appropriate non-recurring cost model must conform to the forward-looking economic cost methodology articulated by the FCC and will, therefore, be based on the most efficient technology deployable in the incumbent LEC's current wire center locations. See FIRST REPORT AND ORDER at 685:

... We, therefore, conclude that the forward-looking pricing methodology for interconnection and unbundled network elements should be based on costs that assume that wire centers will be placed at the incumbent LEC's current wire center locations, but that the reconstructed local network will employ the most efficient technology for reasonably foreseeable capacity requirements.

As a result, a TELRIC-engineered network using forward-looking technologies and efficient processes assumes: total (i.e., all) network element demand is accounted for; the network topology uses currently available technologies which provide for efficient network management; and operational processes represent efficient management or resources.

See Exhibit RJW 2 (NTAB) at page 30, § 14. See also the general principles applied in the NRCM which are described in Section II of the Direct Testimony of Richard Walsh.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-14: Please provide all documents concerning, referring, relating to or substantiating the 4.35% variable overhead expense factor set forth on page 26 of Mr. Walsh's testimony.

Respondent:R. Walsh

RESPONSE: The derivation of the Massachusetts-specific variable overhead expense factor is explained in the recurring cost testimony of Robert Mercer.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-15: Please describe in detail the "panel of experts" level of experience in provisioning service orders for designed and non-designed services as it pertains to the managing of central offices, cable construction and repair, and installation and repair referenced on pages 26-27 of Mr. Walsh's testimony.

Respondent:R. Walsh

RESPONSE: Please see the document attached in AT&T's response to VZ-ATT 3-8.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-16: Please provide all documents and assumptions substantiating the assumption of the "panel of experts" that a 2% fallout rate is reasonable in the provisioning of unbundled network elements referenced on page 30 of Mr. Walsh's testimony.

Respondent: R. Walsh

RESPONSE:

The default input values used in the NRCM, including the 2% fallout rate, were developed over time by a variety of subject matter experts who reached consensus through participating in roundtable discussions. The documentation and justification for the use of these values is fully explained in the NTAB, attached as Exhibit 2 to the Direct Testimony of Richard Walsh and the NRCM Version 2.2 Model Description, attached as Exhibit 1 to the Direct Testimony of Richard Walsh.

Moreover, AT&T notes that both the Massachusetts DTE and the Connecticut DPUC have ordered that a 2% fallout rate be used in calculating non-recurring costs for the provisioning of unbundled network elements.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-17: Please describe in detail Mr. Walsh's background as it pertains to the provisioning of the migration element types referenced on page 27 of his testimony.

Respondent: R. Walsh

RESPONSE: Because migration from an incumbent to a competitive local carrier is a new activity that has only taken place as competition has begun to develop following the passage of the Telecommunications Act of 1996, Mr. Walsh does not have direct past experience with migration. However, the functions involved in migrating UNEs are similar in many respects to the functions involved in provisioning retail services, with which Mr. Walsh's experience is extensive. See response to VZ-ATT 3-12.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-18: Please produce all documents detailing or describing the educational and professional background and experience of each member of the “panel of experts” referenced on pages 26-27 of Mr. Walsh’s testimony, including but not limited to their curricula vitae.

Respondent:R. Walsh

RESPONSE: Please see the document attached in AT&T’s response to VZ-ATT 3-8.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-19: Please identify all work activities that the "panel of experts" accounted for in the 60 seconds necessary to establish an original cross connect service order as contained in the NRCM.

Respondent: R. Walsh

RESPONSE: AT&T objects to this request on the grounds that it is vague and fails to specify with reasonable particularity the task or tasks to which it refers.

In an attempt to be responsive, however, AT&T has operated under the assumption that by asking for the work activities associated with "establish[ing] an original cross connect service order as contained in the NRCM" Verizon seeks information regarding Tasks 74 and 75 in the AT&T NRCM (Install cross connect from MDF to CFA appearance).

The work activities associated with these tasks are the placement and termination of a cross wire between the Cable Pair (located on the MDF) and the CLEC switch equipment CFA (located on the MDF).

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-20: Please identify all work activities the "panel of experts" accounted for in the 30 seconds necessary to disconnect the cross wire on an existing customer service as contained in the NRCM.

Respondent: R. Walsh

RESPONSE: AT&T objects to this request on the grounds that it is vague and fails to specify with reasonable particularity the task or tasks to which it refers.

In an attempt to be responsive, however, AT&T has operated under the assumption that by asking for the work activities associated with "disconnect[ing] the cross wire on an existing customer service as contained in the NRCM." Verizon seeks information regarding Tasks 79 and 80 in the AT&T NRCM (Remove jumper from MDF).

The work activity associated with these tasks is the removal of a cross wire between the Cable Pair (located on the MDF) and the CLEC switch equipment CFA (located on the MDF).

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-21: Please describe in detail the method of cost recovery for all Operational Support Systems (OSSs) as endorsed by AT&T to the FCC for use in the FCC's Universal Service Cost Model.

Respondent: R. Walsh

RESPONSE:

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-22: Please provide the number and percent of digital carrier spans (DS1 level) currently provisioned by AT&T on copper and fiber in Massachusetts.

Respondent: R. Walsh

RESPONSE: AT&T objects to this request on the grounds that it is not relevant to the issue presented in this docket, determining the TELRIC cost of UNEs for Verizon.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-23: Please provide the number and percent of local loops currently provisioned by AT&T on copper and fiber in Massachusetts.

Respondent:R. Walsh

RESPONSE: AT&T objects to this request on the grounds that it is not relevant to the issue presented in this docket, determining the TELRIC cost of UNEs for Verizon.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-24: Please provide AT&T's engineering criteria associated with the placement of distribution cable for customers served by AT&T in the state of Massachusetts, and the associated utilization of that cable at the time of placement.

Respondent:R. Walsh

RESPONSE: AT&T objects to this request on the grounds that it is not relevant to the issue presented in this docket, determining the TELRIC cost of UNEs for Verizon.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-25: Please identify the version of the adjunct model used to produce the cost estimates set forth in Exhibit RJW-4.

Respondent: R. Walsh

RESPONSE: As indicated in Exhibit RJW-4 to the Direct Testimony of Richard Walsh, the version of the xDSL NRC adjunct model used to produce those cost estimates was version R1 Preliminary.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-26: Please provide all documents, time and motion studies, and source material concerning, referring, or relating to the development of the adjunct model.

Respondent: R. Walsh

RESPONSE:

AT&T objects to this request on the grounds that it is overbroad and burdensome in seeking all documents relating to the development of the xDSL NRC adjunct model. Without waiving this objection, AT&T states that File #09 on the CD-ROM version of the NRCM includes a comprehensive description of the model used to generate cost estimates for xDSL.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-27: Please provide all input values to the adjunct model used by Mr. Walsh to produce the costs listed in Exhibit RJW-4. Provide all documents, studies, source material etc. that support the use of these inputs.

Respondent: R. Walsh

RESPONSE: See Mr. Walsh's Direct Testimony, Exhibit 4, Tab (Inputs).

The only input values in the adjunct xDSL NRC model which differ from the default values explained in the NTAB were the Variable Overhead percentage, and labor rates. The input values for these variables were adjusted to be consistent with those used in NRCM version 2.2 as run for Massachusetts.

Exhibit RJW-4 included a typographical error which incorrectly represented the Variable Overhead as .435% instead of 4.35%. Please accept the corrected file as Exhibit RJW-4.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-28: Please provide an electronic copy of the adjunct model used to produce the cost estimates set forth in Exhibit RJW-4. Provide a copy of all documents describing or in any way referring to the model's methodology, assumptions and operation, including but not limited to any minutes or notes taken or recorded at meetings where the model was in any way discussed.

Respondent: R. Walsh

RESPONSE: AT&T objects to this request on the grounds that it is overbroad and burdensome in seeking all documents describing or in any way referring to the model's methodology, assumptions and operation. Without waiving this objection, AT&T states that Walsh's Direct Testimony Exhibit 4 is the actual adjunct model that produces the cost estimates which is found in TAB (Results). Also included is the xDSL OneTime.com Model Description which includes the model's methodology, assumptions and operation. See files #09 and #10 in the CD-ROM version of the NRCM for the model and model description.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: May 29, 2001

VZ-ATT 3-29: Identify all differences between NRCM version 2.2 and the version of the model AT&T filed with the Department in Phase 4 of the *Consolidated Arbitrations* and explain why those changes were made in the current version of the NRCM.

Respondent:R. Walsh

RESPONSE: The attached document lists the changes to NRCM version 2.1, which resulted in the creation of NRCM version 2.2, the current version of the NRCM.